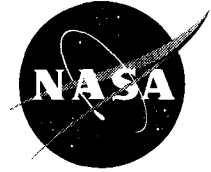


Headquarters

Washington, DC 20546-0001



Reply to Attn of:

Office of the Chief Information Officer

TO: Distribution

FROM: Deputy Chief Information Officer for IT Security

SUBJECT: Decision to cancel Procurement Information Circular (PIC) 04-03 (System Administrator Certification Program)

After thorough review of PIC 04-03 and the artifacts upon which it is based, it is the decision of the Agency that PIC 04-03 is canceled. No overarching legislative or compelling information is identified that establish the requirement or require the continuation of activities levied by PIC 04-03.

To this end, the IT Security Division within the Agency's Office of the Chief Information Officer (OCIO) will no longer provide for certification nor certify and subsequently attest through any third-party certification instrumentation to the proficiency of skills possessed by either contractor or civil servant system administrators.

BACKGROUND

PIC 04-03 established January 26, 2004, sets forth the requirement that all system administrators be required to demonstrate proficiency of skills as a system administrator through a third-party testing and certification procedure administered by NASA. PIC 04-03 describes the requirement to have "*knowledgeable system administrators*" as being promulgated by the Office of Management and Budget (OMB) Circular A-130, *Management of Federal Information Resources*.

Such language has provided the backdrop and reasoning for establishing the System Administrator Certification Program. In its current version, OMB A-130 nor Appendix I-IV make reference whatsoever to "*knowledgeable system administrators*" nor is it as prescriptive or specific as to require agencies to certify and attest to the proficiency of knowledge, skills and abilities possessed by system administrators.

DISCUSSION

1. OMB Circular A-130 Appendix III, *Security of Federal Automated Information Resources*, in referencing the Computer Security Act of 1987 (P.L. 100-225), is prescriptive in requiring training but only to the extent that individuals are apprised of how

to fulfill their security responsibilities before being allowed access to a federal system. Additionally, A-130 mandates that *users* of major applications “*receive specialized training focused on their responsibilities and the application rules*”.

In regard to training for users of general support systems, OMB A-130 upholds the Computer Security Act of 1987, in that Federal Agencies are required “*to provide for the mandatory periodic training in computer security awareness and accepted computer security practices....*”

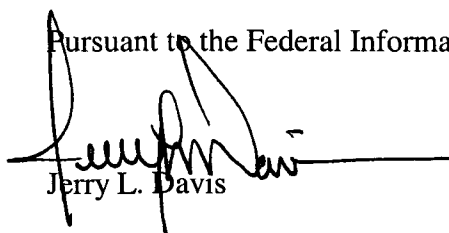
2. The Computer Security Act of 1987, in its current version, makes no reference to or requires the certification of system administrators as part of the Agency's security awareness and training program. Although §5(a)(2) of the Computer Security Act gives latitude to the head of the Agency to provide an alternative security and awareness training program outside what is promulgated by the National Institute of Standards and Technology (NIST), it is the determination of the Agency that certification of system administrators is out of scope with and is not effective in accomplishing the guidelines prescribed by NIST as it relates to periodic (annual) awareness and training.
3. It is pertinent that contractor system administrators possess the requisite skills, knowledge and abilities to perform their duties at the time their services are acquired by NASA. Specific certifications and educational requirements must be made known to potential service providers prior to acquiring specialized skill sets in accordance with Federal Acquisition Regulations.
4. It is not the position of the OCIO, IT Security Division, to provide for the certification of contractor or civil servant system administrators, or any other category of information technology professional, unless the training is prudent and specific to IT security, is mandated by the Federal Information Security Management Act, OMB A-130, the Computer Security Act of 1987, or any other legislative requirement, meets the requirements set by NIST and such a training program exist.

DECISION

It is the decision of the Agency that Procurement Information Circular 04-03 is hereby canceled. The IT Security Division within the Agency's Office of the Chief Information Officer (OCIO) will no longer provide for certification nor certify and subsequently attest through any third-party certification instrumentation to the proficiency of knowledge, skills and abilities possessed by either contractor or civil servant system administrators.

AUTHORITY

Pursuant to the Federal Information Security Management Act (FISMA) § 3544(a)(5) (b)(4).



Jerry L. Davis

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